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To: brandtshnfbt@juno.com
Cc: art.browning@gmail.com; elmerz@hal-pc.org; frankblake@juno.com; sjones@galvbay.org; jeyoung@texanstogether.org; [Sanchez, Carlos](#)
Subject: San Jacinto River Waste Pits Superfund Site
Date: Thursday, February 18, 2016 2:47:00 PM
Attachments: [OMM Plan - App N from Revised Final Removal Action Completion Report 05-2012.pdf](#)
[Operation Monitoring and Maintenance Plan Revision.msg](#)

Dear Brandt,

Thanks for your comments. As we discussed in the meeting last night, I agree that the suggestion for lit buoys is a good one and should be done.

I am attaching a copy of the current Operation, Monitoring, and Maintenance Plan for the San Jacinto Site. I am also copying the Galveston Bay Foundation on this email and hope that they can add it to their web page. We will also be working on getting it on the EPA web page for the site. The EPA has directed the Potentially Responsible Parties to make changes to this plan to improve the safety and the protective measures for the cap. I am attaching a copy of the email to the Potentially Responsible Parties regarding that direction.

The changes include doubling the inspection frequency from semi-annually to quarterly inspections until further notice. The former inspection schedule had the semi-annual inspections (with EPA oversight) continuing until October of this year at which time the frequency would have been reduced to once per year inspections. Going forward, the next site inspection will occur in April 2016 and inspections will follow quarterly after that until further notice. All inspections will be performed by the Potentially Responsible Parties with EPA oversight.

The other changes are the installation of the camera system with 24 hour per day and 7 days per week monitoring, and the installation of the additional warning buoys and floats. Further, we are tasking the Army Corps of Engineers to recommend additional cap inspection and protective measures which may result in additional upgrades to the Operation, Monitoring, and Maintenance Plan.

Your comments will be taken into consideration as EPA develops the Proposed Plan for the final site remedial action. Again, thanks for your input.

Regards,

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From: brandtshnfbt@juno.com [<mailto:brandtshnfbt@juno.com>]

Sent: Thursday, February 18, 2016 10:23 AM



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To: Miller, Gary; Coleman, Sam

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Subject: San Jacinto River Waste Pits Superfund Site

Dear Gary and Sam,

Thank you for the update last night regarding EPA's progress toward determining a final solution for clean-up of the San Jacinto River Waste Pits Superfund Site. The Houston Regional Group of the Sierra Club (Sierra Club) has several comments about the issues brought up at the meeting last night.

- 1) The buoy and or piling system(s) that may be installed around the northern waste pit site (with the temporary cap) should be lit-up at night, during inclement weather (like rain or fog), and during the day (24/7) so that boats and barges can see and avoid this area.
- 2) It would be helpful to place on the Galveston Bay Foundation website a list of the requirements and procedures that EPA was following before the hole in the cap was found in December 2015 and a list of the changes to these requirements or procedures that have or will be made since that time. In this way, the public can see clearly how EPA has responded to and changed its methods for oversight and monitoring of the site.
- 3) EPA stated last night that it will provide much more stringent oversight of what the responsible parties do and will push the responsible parties to quicken their role in implementation of a final solution. The Sierra Club supports this effort particularly since it has been about 8 years since listing of the San Jacinto River Waste Pits as a Superfund site.
- 4) The Sierra Club reiterates its support for a permanent solution which totally removes the waste from the San Jacinto River Waste Pits Superfund Site so that no further dioxin or other contaminant problems reappear in the future. We have a duty to finally resolve this problem so that our children, grandchildren, and others in the future are not burdened with this responsibility and exposed to additional health hazards. Using a 200 parts per trillion (ppt) level for waste clean-up is not good enough. EPA should use at least its 50 ppt limit that is used for people's yards. The Galveston Bay Estuary and public health deserve additional protection especially since the San Jacinto River health advisory prepared by the Texas Department of State Health Services was based upon people's exposure to not more than 2 to 5 ppt of dioxin. Both Alternative 6 and a complete removal alternative should be provided with at a minimum a 50 ppt dioxin removal limit.

The Sierra Club appreciates this opportunity to comment. Thank you.

Sincerely,

Brandt Mannchen
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